

November 19, 2015

Chief Judge Leonard P. Stark  
J. Caleb Boggs Federal Building  
844 N. King Street  
Unit 26  
Room 6124  
Wilmington, DE 19801-3555

Re: *Federal Election Commission v. O'Donnell*, No. 15-cv-00017 (LPS)

Dear Judge Stark:

The parties in the above-referenced matter write to request the scheduling of a discovery teleconference. The following attorneys participated in a verbal meet-and-confer by telephone on November 19, 2015:

Counsel for FEC: Seth Nesin  
Counsel for Defendants: Stephen M. Hoersting

Defendants do not presently have Delaware counsel. Defendants O'Donnell and Marston were invited to participate in the meet-and-confer but did not do so. The dispute requiring judicial attention is listed below:

Defendants have not yet responded to the FEC's First Discovery Requests, which were served on October 8, 2015 and responses were therefore due on November 10, 2015. Defendants have indicated that they can likely provide responses by December 15, 2015. Because that position did not resolve the discovery matter, the Court should address the Commission's request that responses be compelled—and address Defendants' request that the outstanding dates in the Case Scheduling Order be extended by an amount of time the Court believes appropriate.

Respectfully submitted,

Attorneys for Defendants:

Daniel A. Petalas  
Acting General Counsel  
dpetalas@fec.gov

Lisa J. Stevenson  
Deputy General Counsel – Law  
lstevenson@fec.gov

Kevin Deeley  
Acting Associate General Counsel  
kdeeley@fec.gov

Harry J. Summers

Of Counsel:  
Chris K. Gober, Esquire  
Steve Hoersting, Esquire  
GOBER, HILGERS PLLC  
1005 Congress Avenue, Suite 350  
Austin, TX 78701

Assistant General Counsel  
hsummers@fec.gov

Robert W. Bonham III  
Senior Attorney  
rbonham@fec.gov

/s/ Seth Nesin  
Seth Nesin  
Attorney  
snesin@fec.gov

FOR THE PLAINTIFF  
FEDERAL ELECTION COMMISSION  
999 E Street NW  
Washington, DC 20463  
(202) 694-1650